

EXHIBIT 7

Olivia Moylen's Deposition Transcript

Olivia Moylan, R.N.

04/05/2019

1 STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 TEOKA S. WILLIAMS,

6 Plaintiff,

7 -vs-

Civil Action

8 No. 2:18-cv-12522-VAR-MKM
9

10 BEAUMONT HEALTH,

11 Defendant.
12 _____/

13 PAGE 1 TO 42
14

15 The Deposition of OLIVIA MOYLAN, RN,

16 Taken at 19th District Court

17 16077 Michigan Avenue

18 Dearborn, Michigan,

19 Commencing at 10:00 a.m.,

20 Friday, April 5, 2019,

21 Before Michelle C. Vining, CSR 2335, RPR
22
23
24
25

Olivia Moylan, R.N.
04/05/2019

Page 12

1 Teoka?

2 A. Yes.

3 Q. What do you recall concerning that?

4 A. Crystal came up to me and asked me to cover this one
5 patient for Teoka for the remainder of the shift to pass
6 medications, and if the patient needed anything else
7 during the remainder of the shift.

8 Q. Is this a patient that you had been assigned at the
9 start of your shift?

10 A. No.

11 Q. Was it your understanding that this was a patient that
12 was assigned to Teoka Williams at the start of her
13 shift?

14 A. Yes.

15 Q. Is it fair to say that that is not the typical protocol
16 that you were familiar with with regard to patient
17 assignments?

18 A. I wouldn't -- I don't know how to word this. It
19 happened before, if something were -- there was an
20 issue, if we needed someone to cover someone. But I had
21 never had to -- it would -- I had never had to cover in
22 that sense.

23 Q. That is what I was going to ask you. So prior to
24 November 1st and 2nd of 2017, had you ever been asked to
25 cover another nurse's patients?

Olivia Moylan, R.N.

04/05/2019

Page 14

1 Crystal said. I'm asking you what is your understanding
2 based on any discussions you had with anybody or the
3 circumstances of that evening or anything that you've
4 since learned as to the reason you were covering Teoka
5 Williams?

6 MS. DAHLE: Object to the form of the
7 question. It is compound.

8 You can answer as best you can.

9 THE WITNESS: At the time when I was told I
10 would be covering the patient for the rest of the shift,
11 I didn't know exactly what was going on. I just knew
12 that Crystal had told me that I would be the one going
13 in the room to take care of the patient.

14 Later on, I remember in the hallway talking
15 with Teoka, and she had said that the patient had spoke
16 words that were not kind about Teoka.

17 BY MS. GAFKAY:

18 Q. I understand that it may not be typical language that
19 you use, but just for the record so we understand what
20 was said, what did Teoka tell you the patient had said?

21 A. She had said that -- I don't remember if she said she
22 heard or the patient said to her, but she said the
23 patient had spoken she didn't want the black bitch
24 taking care of her.

25 Q. Was it that same shift on November 1st and 2nd that

Olivia Moylan, R.N.
04/05/2019

Page 15

1 Teoka told you that?

2 A. Yes.

3 Q. Did you hear that, did you hear the patient -- well,
4 I'll ask you about that in a moment.

5 Did anybody else tell you that the patient had
6 said something like that?

7 A. Not that I recall, no.

8 Q. Did you actually, were you the one that went into that
9 room after Crystal talked to you?

10 A. Yes, I did go in the room.

11 Q. You said that Crystal said you'd be the one going in the
12 room, correct?

13 A. Yes.

14 Q. So my understanding is that you took over care for both
15 of the patients in that room; is that true?

16 A. No.

17 Q. Did you care for both of the patients in that room, if
18 they needed something?

19 A. No. Not like they weren't my patients. The one --

20 Q. I understand, but I'm --

21 MS. DAHLE: Let her finish, she was going to
22 explain.

23 BY MS. GAFKAY:

24 Q. Go on.

25 A. If the call light was on in the room, any room, and I

Olivia Moylan, R.N.

04/05/2019

Page 19

1 Q. So tell me typically, when you're going to care for a
2 patient, do you get a report, a full report from the
3 nurse who is going off?

4 A. Yes.

5 Q. And so tell me what that is, what does that involve?

6 A. They tell us why the patient had come into the hospital,
7 how alert the patient is. I ask if the patient gets up
8 and walks. We talk about the patients skin, how long
9 they take their medication, if anything significant
10 happened in that shift regarding the patient, and what
11 the plan of care is.

12 Q. You don't recall whether Crystal advised you to get a
13 report from Ms. Williams?

14 A. No.

15 Q. And you don't know, you don't recall getting a full
16 report from Ms. Williams, do you?

17 A. Not that I recall.

18 Q. Do you recall complaining to Ms. Ward or talking to --
19 you know who Ms. Ward is, correct?

20 A. Yes.

21 Q. Do you recall talking to Ms. Ward about the fact that
22 this shift in question, November 1 through 2 of 2017,
23 that you were providing care for both of the patients in
24 the room on 8 North where the patient that you took over
25 care for Teoka was, do you recall talking to her about

Olivia Moylan, R.N.

04/05/2019

Page 20

1 that?

2 A. No.

3 Q. So did that ever happen, did you talk to her about that?

4 MS. DAHLE: About what, can you be specific
5 about what?

6 BY MS. GAFKAY:

7 Q. About what I just asked you about. I didn't want to
8 repeat the whole question. Did you --

9 A. About?

10 Q. -- ever talk to Ms. Ward about the fact that you had
11 taken over the care of both patients in that room?

12 A. No.

13 Q. Did you ever tell Ms. Williams that you took over both,
14 the care for both the patients in that room?

15 A. No. Not that I recall.

16 Q. Did Ms. Williams tell you to take over the care of both
17 patients in that room?

18 A. No.

19 Q. Did Crystal tell you that Ms. Williams should not be in
20 that room?

21 A. No.

22 Q. Did Crystal tell you that Ms. Williams should not be
23 providing care for that particular patient, that you
24 were taking over the care for?

25 A. She told me to take over the care for the patient and

Olivia Moylan, R.N.
04/05/2019

Page 26

1 Q. Why not?

2 A. Teoka was told to give report.

3 Q. When you assume the care of a patient and there is an
4 oncoming nurse for the next shift, what is the typical
5 protocol for reports?

6 A. If you have the patient, you're giving report to the
7 oncoming nurse.

8 Q. That didn't happen with this particular patient, did it?

9 A. No, because I didn't have the patient for the full
10 shift. I may have given updates, but I don't recall
11 giving a full report on the patient.

12 Q. Well, you certainly -- at some point during the shift,
13 your supervisor directed you to assume care of this
14 patient, correct?

15 A. Yes.

16 Q. And despite assuming the care of this patient, when the
17 new nurse came on, you did not give that nurse a full
18 report regarding this patient, did you?

19 A. No.

20 Q. That is not typical -- that is -- that's against what
21 typically is done, isn't it?

22 A. If you have a patient for the shift, that's your patient
23 and you're giving report when an oncoming nurse comes
24 on.

25 Q. What about when you've assumed care for a patient,

Olivia Moylan, R.N.
04/05/2019

Page 33

1 Q. Do the records reflect that you administered medication
2 to this patient?

3 A. Well, it shows I didn't give the medication, but I had
4 to go in and scan the patient.

5 Q. Who would have given the medication?

6 A. Well, I had marked that I didn't give the medication
7 because the patient was on a drip.

8 Q. I see. But you had to check the patient physically?

9 A. Yes.

10 Q. And if she had not been on a drip, would you have had to
11 give her the medication?

12 A. Yes.

13 Q. So you provided some type of care to the patient, direct
14 care, true?

15 A. Yes.

16 Q. Let me just ask you -- I asked you directly about Toni
17 Ward. But let me ask you, did you discuss or complain
18 or make mention to anybody, including Crystal, Toni,
19 Teoka, a co-worker, anybody, that you had been required
20 to care for both patients in the room where you had been
21 directed to provide care in place of Teoka Williams?

22 A. Not that I recall.

23 Q. I'm going to take a brief -- well, let me ask you this.
24 Have you talked to anybody -- other than Beaumont's
25 attorneys, have you talked to anybody else regarding